

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, DC 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

DOCKET NO. N2011-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES  
POSTAL SERVICE [DBP/USPS-79 through 82]

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following interrogatories pursuant to the Commission's Rules of Practice and Procedure. Any reference to testimony or other sources should indicate the page and line numbers. The instructions contained in the interrogatories DFC/USPS-T1-1-6 in Docket MC2006-7 dated February 23, 2007, are incorporated herein by reference. I am available for informal discussion to respond to your request to "clarify questions and to identify portions of discovery requests considered overbroad or burdensome."

September 26, 2011

Respectfully submitted,

N20111P79

DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

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DBP/USPS-79 Please refer to your response to Interrogatory DBP/USPS-74 subpart [b].

[a] Please confirm that it is the policy of the Postal Service when providing a spreadsheet as part of a PRC pleading that all of the data that appears on a specific horizontal line in that spreadsheet will refer to the same activity.

[b] If you are unable to confirm subpart [a] of this interrogatory, please explain whether the Postal Service believes that it could be confusing to the recipient of a spreadsheet to have data on the same horizontal line refer to different activities particularly when there is no indication of this in the spreadsheet.

[c] Please advise whether you believe that it could be misleading to show Northern New Jersey in the same horizontal line as three facilities that are not in that district regardless of the method used for sorting the data.

[d] Please advise why the Postal Service is not correcting the spreadsheet so that data that appears on the same horizontal line will refer to the same activity.

DBP/USPS-80 Please refer to your response to Interrogatory DBP/USPS-74 subpart [c].

[a] Please provide the criteria used to assign a CAG level between A and G and between H and J since they have the same revenue units.

[b] Please advise the types of revenue that are utilized and the types that are not utilized in determining the number of \$387.55 revenue units a given office will have.

[c] Please confirm or explain that the revenue from all stations and branches will be combined together with that of the main facility to arrive at a total revenue value.

DBP/USPS-81 Please refer to your response to Interrogatory DBP/USPS-64 subpart [b]

If there is no significance to this entry, why is it there?

DBP/USPS-82 Please refer to Library Reference USPS LR N2011-1/11 filed on September 21, 2011.

For each of the facilities no longer under consideration for discontinuance review, please advise the condition or conditions that led to that decision. The response should be facility specific and not generalities why the group of facilities was placed on the list.